

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF TEXAS  
SHERMAN DIVISION**

**INTELLECTUAL VENTURES I LLC AND  
INTELLECTUAL VENUTRES II, LLC,**

**Plaintiff,**

**vs.**

**AMERICAN AIRLINES, INC.,**

**Defendant.**

**Civil Action No. 4:24-cv-00980**

**JURY TRIAL**

**DEFENDANT AMERICAN AIRLINES, INC.'S UNOPPOSED MOTION TO EXTEND  
THE DEADLINE TO FILE A REPLY TO THE PLAINTIFFS' RESPONSE TO THE  
DEFENDANT'S MOTION TO DISMISS (DKT. 31)**

Defendant American Airlines, Inc. files this Unopposed Motion to Extend the Deadline to file a Reply to the Plaintiffs' Response to the Defendant's Motion to Dismiss (Dkt. 31).

Defendant's reply to the Motion to Dismiss is currently due on Thursday, March 27, 2025. Defendant requests a one-week extension of time until Thursday, April 3, 2025 to reply to the response filed by Plaintiffs. Plaintiffs do not oppose this Motion. The brief extension is not sought for the purposes of delay. Additionally, the extension does not change the date of any hearing, trial, or other Court date, or extend any deadline of a final submission that affects the Court's ability to hold a scheduled hearing, trial or Court event.

Wherefore, the Defendant respectfully requests the Court allow the Defendant until Thursday, April 3, 2025 to file the reply to the Plaintiffs' Response to the Motion to Dismiss (Dkt. 31).

Dated: March 25, 2025.

**McKool Smith, P.C.**

/s/ John B. Campbell

John B. Campbell

Texas State Bar No. 24036314

jcampbell@McKoolSmith.com

Kyle Ryman

Texas State Bar No. 24125394

kryman@mckoolsmith.com

Kenneth M. Scott

Texas State Bar No. 24137497

kscott@McKoolSmith.com

**McKool Smith, P.C.**

303 Colorado Street Suite 2100

Austin, TX 78701

Telephone: (512) 692-8700

Telecopier: (512) 692-8744

Emily Tannenbaum

New York State Bar No. 5928130

etannenbaum@mckoolsmith.com

**McKool Smith, P.C.**

1301 Avenue of the Americas, 32<sup>nd</sup> Floor

New York, NY 10019

Telephone: (212) 402-9400

Telecopier: (212) 402-9444

Casey L. Shomaker

Texas State Bar No. 24110359

cshomaker@mckoolsmith.com

**McKool Smith, P.C.**

300 Crescent Court, Suite 1500

Dallas, TX 75201

Telephone: (214) 978-4000

Facsimile: (214) 978-4044

Alan P. Block

California State Bar No. 143783

ablock@mckoolsmith.com

**McKool Smith, P.C.**

300 South Grand Avenue, Suite 2900

Los Angeles, CA 90071

Telephone: (213) 694-1054

Telecopier: (213) 694-1234

ATTORNEYS FOR DEFENDANT  
AMERICAN AIRLINES, INC.

**CERTIFICATE OF CONFERENCE**

Pursuant to Local Rule CV-7(i), I hereby certify that counsel for the parties have complied with the meet and confer requirement set forth in Local Rule CV-7(h) and this motion is filed unopposed.

/s/ John B. Campbell

John B. Campbell

**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the above and foregoing document has been served on all counsel of record via the Court's ECF system on March 25, 2025.

/s/ John B. Campbell

John B. Campbell